1:13-md-02475 (ALC)
[Oral Argument Requested]
NOTICE OF DEFENDANT PHIBRO COMMODITIES LIMITED'S
MOTION TO DISMISS PLAINTIFF'S SECOND AMENDED
CONSOLIDATED CLASS ACTION COMPLAINT FOR LACK OF PERSONAL JURISDICTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declaration of Roger Plaisted, the undersigned will move this Court before the Honorable Andrew L. Carter, United States District Judge for the Southern District of New York, in Courtroom 1306 at the Thurgood Marshall United States Courthouse, located at 40 Foley Square, New York, New York, 10007, on such date and at such time as the Court sets, for an Order pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure dismissing Plaintiffs' Second Amended Consolidated Class Action Complaint for Lack of Personal Jurisdiction with prejudice.

PLEASE TAKE FURTHER NOTICE, that, pursuant to the Court's February 26, 2015 Order, Dkt. No. 307, opposition papers, if any, shall be served on or before 14 days after service of this Motion. Any reply papers shall be served on or before 7 days after service of any opposition papers.

DATED: Houston, Texas

March 27, 2015

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By:/s/ Karl S. Stern

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# **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system this 27th day of March, 2015. Any other counsel of record will be served by facsimile transmission and/or first class mail.

/s/ Karl S. Stern

Karl S. Stern